

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)	
		FEBRUARY 2019	001262
E-Filing Number: 1902028289			
PLAINTIFF'S NAME EDWARD WALLS		DEFENDANT'S NAME MEDTRONIC, INC.	
PLAINTIFF'S ADDRESS 6440 HAVERFORD AVE. PHILADELPHIA PA 19151		DEFENDANT'S ADDRESS 710 MEDTRONIC PKWY MINNEAPOLIS MN 55432	
PLAINTIFF'S NAME TONYA CHAVIS-WALLS		DEFENDANT'S NAME MEDTRONIC USA, INC.	
PLAINTIFF'S ADDRESS 6440 HAVERFORD AVE. PHILADELPHIA PA 19151		DEFENDANT'S ADDRESS 710 MEDTRONIC PKWY MINNEAPOLIS MN 55432	
PLAINTIFF'S NAME		DEFENDANT'S NAME PHYSIO-CONTROL, INC.	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 710 MEDTRONIC PKWY MINNEAPOLIS MN 55432	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 12	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2P - PRODUCT LIABILITY			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		FILED PRO PROTHY FEB 14 2019 A. SILIGRINI	
		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>EDWARD WALLS , TONYA CHAVIS-WALLS</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY CHRISTOPHER A. BRADLEY		ADDRESS 2410 BRISTOL RD. BENSALEM PA 19020	
PHONE NUMBER (215) 702-2708	FAX NUMBER (215) 750-0895		
SUPREME COURT IDENTIFICATION NO. 84818		E-MAIL ADDRESS bradley@swainlawfirm.com	
SIGNATURE OF FILING ATTORNEY OR PARTY CHRISTOPHER BRADLEY		DATE SUBMITTED Thursday, February 14, 2019, 01:44 pm	

COMPLETE LIST OF DEFENDANTS:

1. MEDTRONIC, INC.
710 MEDTRONIC PKWY
MINNEAPOLIS MN 55432
2. MEDTRONIC USA, INC.
710 MEDTRONIC PKWY
MINNEAPOLIS MN 55432
3. PHYSIO-CONTROL, INC.
710 MEDTRONIC PKWY
MINNEAPOLIS MN 55432
4. TEMPLE UNIVERSITY HEALTH SYSTEM FOUNDATION
3509 N. BROAD ST., 9TH FL.
PHILADELPHIA PA 19140
5. TEMPLE UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER EDUCA
BROAD ST. AND MONTGOMERY AVE.
PHILADELPHIA PA 19122
6. TEMPLE UNIVERSITY PHYSICIANS AND SURGEONS, INC.
1330 POLETT WALK 300 SULLIVAN HALL
PHILADELPHIA PA 19122
7. TEMPLE UNIVERSITY PHYSICIANS
RISK MANAGEMENT DEPARTMENT 3401 N. BROAD ST.
PHILADELPHIA PA 19140
8. TEMPLE PHYSICIANS, INC.
3509 N. BROAD ST., 9TH FL.
PHILADELPHIA PA 19140
9. TEMPLE UNIVERSITY HOSPITAL
3401 N. BROAD ST.
PHILADELPHIA PA 19140
10. TEMPLE UNIVERSITY HEALTH SYSTEM, INC.
3509 N. BROAD ST., 9TH FL.
PHILADELPHIA PA 19140
11. TEMPLE UNIVERSITY HOSPITAL, INC.
3509 N. BROAD ST., 9TH FL.
PHILADELPHIA PA 19140
12. PATRICK CONNOLLY
322 BROWN ST., APT. 40
PHILADELPHIA PA 19123

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Filed and Attested by the
Office of Judicial Records

14 FEB 2019 01:44 pm

A. SILIGRINT

**EDWARD WALLS and TONYA CHAVIS-
WALLS**

6440 Haverford Rd.
Philadelphia, PA 19151

Plaintiffs

v.

MEDTRONIC, INC.

c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

MEDTRONIC USA, INC.

c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

PHYSIO-CONTROL, INC.

c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

**TEMPLE UNIVERSITY HEALTH SYSTEM
FOUNDATION**

3509 N. Broad St., 9th Floor
Philadelphia, PA 19140

and

**TEMPLE UNIVERSITY OF THE
COMMONWEALTH SYSTEM OF HIGHER
EDUCATION**

Broad St. and Montgomery Ave.
Philadelphia, PA 19122

and

**TEMPLE UNIVERSITY PHYSICIANS AND
SURGEONS, INC.**

1330 Polett Walk
300 Sullivan Hall
Philadelphia, PA 19122

and

TEMPLE UNIVERSITY PHYSICIANS

Risk Management Department
3401 N. Broad St.
Philadelphia, PA 19140

COURT OF COMMON PLEAS
Trial Division

FEBRUARY TERM, 2019

NO: _____

MAJOR JURY

<p>and TEMPLE PHYSICIANS, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and TEMPLE UNIVERSITY HOSPITAL 3401 N. Broad St. Philadelphia, PA 19140 and TEMPLE UNIVERSITY HEALTH SYSTEM, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and TEMPLE UNIVERSITY HOSPITAL, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and PATRICK CONNOLLY, M.D. 322 Brown St., Apt. 40 Philadelphia, PA 19123</p> <p style="text-align: center;">Defendants</p>	
--	--

PRAECIPE FOR WRIT OF SUMMONS

TO THE OFFICE OF JUDICIAL RECORDS:

Kindly issue a Writ of Summons in the above captioned civil action.

THE SWAIN LAW FIRM, P.C.

By: /s/ Christopher A. Bradley, Esq.
Andrew D. Swain, Esq. (Attorney #73332)
Christopher A. Bradley, Esq. (Attorney # 84818)
Attorney for Plaintiffs
2410 Bristol Road
Bensalem, PA 19020
(215)702-2708

Date: 02/14/2019

Summons
Citacion

Commonwealth of Pennsylvania
COUNTY OF PHILADELPHIA

Filed and Attested by the
Office of Judicial Records
14 FEB 2019 01:44 pm
A. SILIGRINI

Edward Walls and Tonya Chavis-Walls

Plaintiff

vs.

Medtronic, Inc., et al.

Defendant

COURT OF COMMON PLEAS

February Term, 20¹⁹

No. _____

To¹

Medtronic, Inc.

Medtronic USA, Inc.

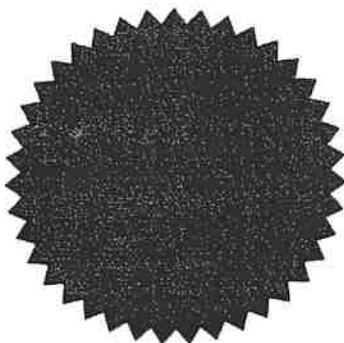
Physio-Control, Inc.

Writ of Summons

You are notified that the Plaintiff²
Usted esta avisado que el demandante

Edward Walls and Tonya Chavis-Walls

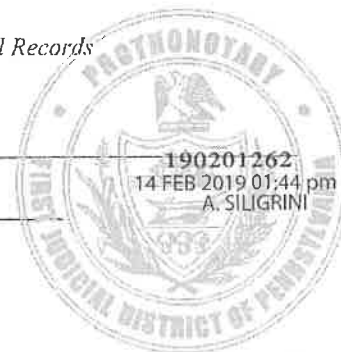
Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Director, Office of Judicial Records

By: _____

Date: _____



¹ Name(s) of Defendant(s)

² Name(s) of Plaintiff(s)

Court of Common Pleas

February Term, 20 19

No. _____

Edward Walls and Tonya Chavis-Walls

Plaintiff

vs.

Medtronic, Inc., et al.

Defendant

SUMMONS

Additional Defendants

TEMPLE UNIVERSITY HEALTH SYSTEM FOUNDATION

**TEMPLE UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER
EDUCATION**

TEMPLE UNIVERSITY PHYSICIANS AND SURGEONS, INC.

TEMPLE UNIVERSITY PHYSICIANS

TEMPLE PHYSICIANS, INC.

TEMPLE UNIVERSITY HOSPITAL

TEMPLE UNIVERSITY HEALTH SYSTEM, INC.

TEMPLE UNIVERSITY HOSPITAL, INC.

PATRICK CONNOLLY, M.D.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Filed and Attested by the
Office of Judicial Records
15 FEB 2019 12:02 pm
M. RUSSO

**EDWARD WALLS and TONYA CHAVIS-
WALLS**

6440 Haverford Rd.
Philadelphia, PA 19151

Plaintiffs

v.

MEDTRONIC, INC.
c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

MEDTRONIC USA, INC.
c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

PHYSIO-CONTROL, INC.
c/o Corporation Service Company
2595 Interstate Dr., Suite 103
Harrisburg, PA 17110

and

**TEMPLE UNIVERSITY HEALTH SYSTEM
FOUNDATION**
3509 N. Broad St., 9th Floor
Philadelphia, PA 19140

and

**TEMPLE UNIVERSITY OF THE
COMMONWEALTH SYSTEM OF HIGHER
EDUCATION**
Broad St. and Montgomery Ave.
Philadelphia, PA 19122

and

**TEMPLE UNIVERSITY PHYSICIANS AND
SURGEONS, INC.**
1330 Polett Walk
300 Sullivan Hall
Philadelphia, PA 19122

and

**TEMPLE UNIVERSITY PHYSICIANS
Risk Management Department**
3401 N. Broad St.
Philadelphia, PA 19140

COURT OF COMMON PLEAS
Trial Division

FEBRUARY TERM, 2019

NO: 01262

MAJOR JURY

<p>and TEMPLE PHYSICIANS, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and TEMPLE UNIVERSITY HOSPITAL 3401 N. Broad St. Philadelphia, PA 19140 and TEMPLE UNIVERSITY HEALTH SYSTEM, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and TEMPLE UNIVERSITY HOSPITAL, INC. 3509 N. Broad St., 9th Floor Philadelphia, PA 19140 and PATRICK CONNOLLY, M.D. 322 Brown St., Apt. 40 Philadelphia, PA 19123 and MEDTRONIC PLC 7000 Central Ave., NE Minneapolis, MN 55432 and MEDTRONIC NEUROMODULATION 7000 Central Ave., NE Minneapolis, MN 55432 and MEDTRONIC PUERTO RICO OPERATIONS CO. 7000 Central Ave., NE Minneapolis, MN 55432</p> <p style="text-align: center;">Defendants</p>	
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PRAECIPE TO REISSUE WRIT OF SUMMONS

TO THE OFFICE OF JUDICIAL RECORDS:

Kindly reissue a Writ of Summons in the above captioned civil action.

THE SWAIN LAW FIRM, P.C.

By: /s/ Christopher A. Bradley, Esq.
Christopher A. Bradley, Esq. (Attorney # 84818)

Date: 02/15/2019

Case ID: 190201262

Citation

Commonwealth of Pennsylvania
COUNTY OF PHILADELPHIA

Filed and Attested by the
Office of Judicial Records
15 FEB 2019 12:02 pm

M. RUSSO

Edward Walls and Tonya Chavis-Walls

Plaintiff

COURT OF COMMON PLEAS

February Term, 20¹⁹

vs.

No. 01262

Medtronic, Inc., et al.

Defendant

To¹

Medtronic, Inc.

Medtronic USA, Inc.

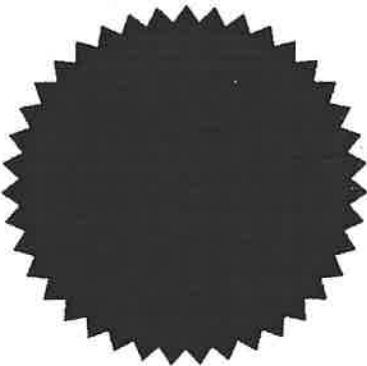
Physio-Control, Inc.

Writ of Summons

You are notified that the Plaintiff²
Usted esta avisado que el demandante

Edward Walls and Tonya Chavis-Walls

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Director, Office of Judicial Records

By: _____

Date: _____



Court of Common Pleas

February Term, 20 19

No. 01262

Edward Walls and Tonya Chavis-Walls
Plaintiff

vs.

Medtronic, Inc., et al.
Defendant

SUMMONS

Additional Defendants

TEMPLE UNIVERSITY HEALTH SYSTEM FOUNDATION

**TEMPLE UNIVERSITY OF THE COMMONWEALTH SYSTEM OF HIGHER
EDUCATION**

TEMPLE UNIVERSITY PHYSICIANS AND SURGEONS, INC.

TEMPLE UNIVERSITY PHYSICIANS

TEMPLE PHYSICIANS, INC.

TEMPLE UNIVERSITY HOSPITAL

TEMPLE UNIVERSITY HEALTH SYSTEM, INC.

TEMPLE UNIVERSITY HOSPITAL, INC.

PATRICK CONNOLLY, M.D.

MEDTRONIC PLC

MEDTRONIC NEUROMODULATION

MEDTRONIC PUERTO RICO OPERATIONS CO.

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:18 pm
S. RICE

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Health System Foundation

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

**PHYSICAL DESCRIPTION: Age: 40 Weight: 180
Sex: Female Height: 5'2**

**Hair: Blonde
Race: Caucasian**

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander
William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165701

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:20 pm
G. IMPERATO

Edward Walls and Tonya Chavis-Walls
v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University of the Commonwealth System of Higher Education

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180
Sex: Female Height: 5'2

Hair: Blonde
Race: Caucasian

SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165702

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:23 pm
S. RICE

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Physicians and Surgeons, Inc.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #0165703

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:25 pm
C. JONES

Edward Walls and Tonya Chavis-Walls

v.

Medtronic, Inc., et al.

Case No.:19-02-1262

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Physicians

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

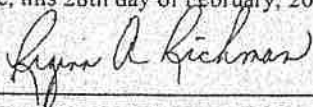
DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian


**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165704

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:28 pm
S. RICE

Edward Walls and Tonya Chavis-Walls
v.

Medtronic, Inc., et al.

Case No.:19-02-1262

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple Physicians, Inc.

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262
Order #P165705

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:30 pm
C. JONES

Edward Walls and Tonya Chavis-Walls

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Hospital

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

William Alexander

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:32 pm
S. RICE

Edward Walls and Tonya Chavis-Walls

v.

Medtronic, Inc., et al.

Case No.:19-02-1262

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Health System, Inc.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

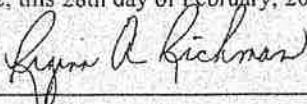
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165707

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 02:35 pm
C. JONES

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Hospital, Inc.

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

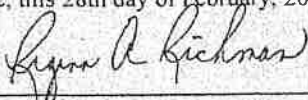
DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165708

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:06 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Health System Foundation**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

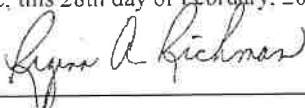
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165701

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:06 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University of the Commonwealth System of Higher Education

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

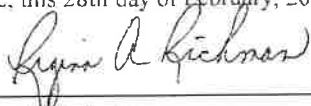
DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262
Order #P165702

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:06 pm
S. RICE

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Physicians and Surgeons, Inc.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

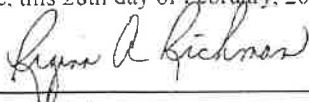
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165703

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:06 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Physicians

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

William Alexander

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165704

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:09 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple Physicians, Inc.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

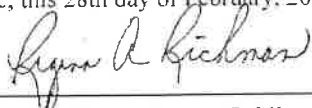
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165705

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:09 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Hospital**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

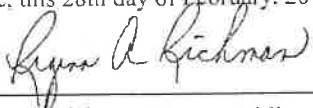
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

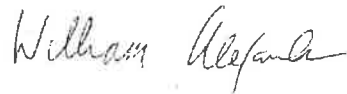
SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315.
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165706

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:09 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Temple University Health System, Inc.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Amy Dachowski, Litigation Support Analyst**

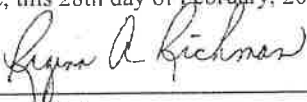
DATE & TIME OF SERVICE: **2/27/2019 4:00 PM**

PHYSICAL DESCRIPTION: **Age: 40 Weight: 180 Hair: Blonde**
Sex: Female Height: 5'2 Race: Caucasian

SERVED ADDRESS: **2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165707

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

*Filed and Attested by the
Office of Judicial Records
01 MAR 2019 03:09 pm
S. RICE*

Edward Walls and Tonya Chavis-Walls

v.

Medtronic, Inc., et al.

Case No.:19-02-1262

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: Temple University Hospital, Inc.

DOCUMENTS SERVED: Writ of Summons

BY LEAVING WITH: Amy Dachowski, Litigation Support Analyst

DATE & TIME OF SERVICE: 2/27/2019 4:00 PM

PHYSICAL DESCRIPTION: Age: 40 Weight: 180 Hair: Blonde
Sex: Female Height: 5'2 Race: Caucasian

**SERVED ADDRESS: 2450 W. Hunting Park Avenue
Philadelphia, PA 19129**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 28th day of February, 2019

Regina A. Richman

Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021

William Alexander

William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165708

POST & SCHELL, P.C.
BY: AMALIA V. ROMANOWICZ,
ESQUIRE
E-MAIL: aromanowicz@postschell.com
I.D. # 65412
MICHAEL J. RYAN, ESQUIRE
E-MAIL: mryan@postschell.com
I.D. # 307654
FOUR PENN CENTER, 13TH FLOOR
1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PA 19103-2808
215-587-1000

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC., TEMPLE UNIVERSITY
PHYSICIANS, TEMPLE PHYSICIANS,
INC., TEMPLE UNIVERSITY HOSPITAL,
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC., TEMPLE UNIVERSITY HOSPITAL,
INC., PATRICK CONNOLLY, M.D.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

ATTORNEYS FOR DEFENDANTS
TEMPLE UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE
UNIVERSITY - OF THE
COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS, TEMPLE
PHYSICIANS, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM, INC.,
TEMPLE UNIVERSITY HOSPITAL, INC.
AND PATRICK CONNOLLY, M.D.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

ENTRY OF APPEARANCE

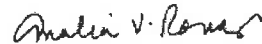
TO THE PROTHONOTARY:

Kindly enter the appearance of Amalia V. Romanowicz, Esquire and Michael J. Ryan,
Esquire in the above-captioned matter on behalf of Temple University Health System

Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D.

POST & SCHELL, P.C.

BY:



DATED: March 12, 2019

AMALIA V. ROMANOWICZ, ESQUIRE
MICHAEL J. RYAN, ESQUIRE
Attorneys for Defendants, Temple
University Health System Foundation,
Temple University - Of the Commonwealth
System of Higher Education, Temple
University Physicians, Temple Physicians,
Inc., Temple University Health System,
Inc., Temple University Hospital, Inc. and
Patrick Connolly, M.D.

POST & SCHELL, P.C.
BY: AMALIA V. ROMANOWICZ,
ESQUIRE
E-MAIL: aromanowicz@postschell.com
I.D. # 65412
MICHAEL J. RYAN, ESQUIRE
E-MAIL: mryan@postschell.com
I.D. # 307654
FOUR PENN CENTER, 13TH FLOOR
1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PA 19103-2808
215-587-1000

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC., TEMPLE UNIVERSITY
PHYSICIANS, TEMPLE PHYSICIANS,
INC., TEMPLE UNIVERSITY HOSPITAL,
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC., TEMPLE UNIVERSITY HOSPITAL,
INC., PATRICK CONNOLLY, M.D.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

ATTORNEYS FOR DEFENDANTS
TEMPLE UNIVERSITY HEALTH
SYSTEM FOUNDATION, TEMPLE
UNIVERSITY - OF THE
COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS, TEMPLE
PHYSICIANS, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM, INC.,
TEMPLE UNIVERSITY HOSPITAL, INC.
AND PATRICK CONNOLLY, M.D.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

DEMAND FOR JURY TRIAL

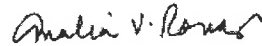
TO THE PROTHONOTARY:

Kindly enter the demand of Defendants, Temple University Health System Foundation,
Temple University - Of the Commonwealth System of Higher Education, Temple University

Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., for a trial by twelve jurors.

POST & SCHELL, P.C.

BY:



DATED: March 12, 2019

AMALIA V. ROMANOWICZ, ESQUIRE
MICHAEL J. RYAN, ESQUIRE
Attorneys for Defendants, Temple
University Health System Foundation,
Temple University - Of the Commonwealth
System of Higher Education, Temple
University Physicians, Temple Physicians,
Inc., Temple University Health System,
Inc., Temple University Hospital, Inc. and
Patrick Connolly, M.D.

POST & SCHELL, P.C.
BY: AMALIA V. ROMANOWICZ,
ESQUIRE
E-MAIL: aromanowicz@postschell.com
I.D. # 65412
MICHAEL J. RYAN, ESQUIRE
E-MAIL: mryan@postschell.com
I.D. # 307654
FOUR PENN CENTER, 13TH FLOOR
1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PA 19103-2808
215-587-1000

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC., TEMPLE UNIVERSITY
PHYSICIANS, TEMPLE PHYSICIANS,
INC., TEMPLE UNIVERSITY HOSPITAL,
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC., TEMPLE UNIVERSITY HOSPITAL,
INC., PATRICK CONNOLLY, M.D.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

ATTORNEYS FOR DEFENDANTS
TEMPLE UNIVERSITY HEALTH
SYSTEM FOUNDATION, TEMPLE
UNIVERSITY - OF THE
COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS, TEMPLE
PHYSICIANS, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM, INC.,
TEMPLE UNIVERSITY HOSPITAL, INC.
AND PATRICK CONNOLLY, M.D.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

PRAECIPE FOR RULE TO FILE A COMPLAINT

TO THE PROTHONOTARY:

Please enter a Rule upon the plaintiffs to file a Complaint within twenty (20) days hereof or suffer the entry of a judgment of non pros.

POST & SCHELL, P.C.

BY:

Amalia V. Roman

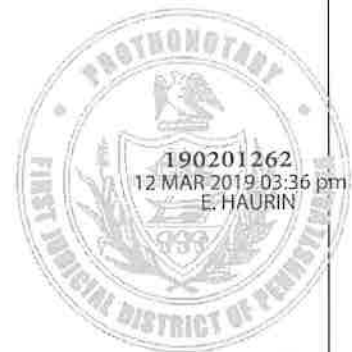
DATED: March 12, 2019

AMALIA V. ROMANOWICZ, ESQUIRE
MICHAEL J. RYAN, ESQUIRE
Attorneys for Defendants, Temple
University Health System Foundation,
Temple University – Of the Commonwealth
System of Higher Education, Temple
University Physicians, Temple Physicians,
Inc., Temple University Health System,
Inc., Temple University Hospital, Inc. and
Patrick Connolly, M.D.

RULE TO FILE A COMPLAINT

AND NOW this 12th day of March 2019, a Rule is hereby granted upon the plaintiffs to file a Complaint herein within twenty (20) days after service hereof or suffer the entry of a judgment of non pros.

Prothonotary



Case ID: 190201262

Christopher A. Bradley, Esquire
2410 Bristol Road
Bensalem, PA 19020
(215) 702-2708

**Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County**

Filed and Attested by the
Office of Judicial Records
13 MAR 2019 08:23 am
S. RICE

Edward Walls and Tonya Chavis-Walls

v.

Case No.:19-02-1262

Medtronic, Inc., et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF CORPORATE SERVICE

I, **William Alexander**, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY SERVED: **Patrick Connolly, M.D.**

DOCUMENTS SERVED: **Writ of Summons**

BY LEAVING WITH: **Renee Biggs, Clinical Coordinator**

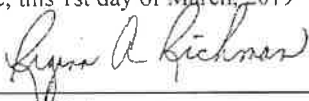
DATE & TIME OF SERVICE: **3/1/2019 11:20 AM**

PHYSICAL DESCRIPTION: **Age: 25 Weight: 140 Hair: Black**
Sex: Female Height: Sitting Race: Black

SERVED ADDRESS: **217 Madison Avenue
Mount Holly, NJ 08060**

I hereby affirm that the information contained in the Affidavit of Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary
Public, this 1st day of March, 2019



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2021



William Alexander
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1315,
Philadelphia, PA 19102
(215) 977-9393



Case ID: 190201262

Order #P165709

Office of the Sheriff

David E. Olweiler
Real Estate Deputy

David B. Dowling
Solicitor



Filed and Attested by the
Office of Judicial Records

25 MAR 2019 01:54 pm

G. IMPERATO
Chief Deputy

Dauphin County
101 Market Street
Harrisburg, Pennsylvania 17101-2079
ph: (717) 780-6590 fax: (717) 780-6557

Nicholas Chimienti Jr.
Sheriff

Commonwealth of Pennsylvania

: EDWARD WALLS AND TONYA CHAVIS-
WALLS

VS

County of Dauphin

: MEDTRONIC, INC.

Sheriff's Return

No. 2019-T-0632

OTHER COUNTY NO. 190201262

And now: MARCH 1, 2019 at 11:55:00 AM served the within REISSUED WRIT OF SUMMONS upon MEDTRONIC, INC. by personally handing to DAVE BULAKOWSKI (SERVICE ASSOCIATE) 1 true attested copy of the original REISSUED WRIT OF SUMMONS and making known to him/her the contents thereof at C/O CSC, 2595 INTERSTATE DRIVE, SUITE 103 HARRISBURG PA 17110

Sworn and subscribed to
before me this 6TH day of March, 2019

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Karen M. Hoffman, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires January 8, 2022
Commission number 1257392

So Answers,

Sheriff of Dauphin County, Pa.

By

Deputy Sheriff

Deputy: HOWARD J LYNDE

Sheriff's Costs: \$85.75 2/28/2019

Office of the Sheriff



Filed and Attested by the
Office of Judicial Records
25 MAR 2019 01:56 pm

S. RICE
Jack Dugan
Chief Deputy

David E. Olweiler
Real Estate Deputy

David B. Dowling
Solicitor

Dauphin County
101 Market Street
Harrisburg, Pennsylvania 17101-2079
ph: (717) 780-6590 fax: (717) 780-6557

Nicholas Chimienti Jr.
Sheriff

Commonwealth of Pennsylvania

: EDWARD WALLS AND TONYA CHAVIS-
WALLS

VS

County of Dauphin

: MEDTRONIC, INC.

Sheriff's Return

No. 2019-T-0632

OTHER COUNTY NO. 190201262

And now: MARCH 1, 2019 at 11:55:00 AM served the within REISSUED WRIT OF SUMMONS upon MEDTRONIC USA, INC. by personally handing to DAVE BULAKOWSKI (SERVICE ASSOCIATE) 1 true attested copy of the original REISSUED WRIT OF SUMMONS and making known to him/her the contents thereof at C/O CSC, 2595 INTERSTATE DRIVE, SUITE 103 HARRISBURG PA 17110

Sworn and subscribed to
before me this 6TH day of March, 2019

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Karen M. Hoffman, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires January 8, 2022
Commission number 1257392

So Answers,

Sheriff of Dauphin County, Pa.

By

Deputy Sheriff

Deputy: HOWARD J LYNDE
Sheriff's Costs: \$85.75 2/28/2019

Office of the Sheriff



Filed and Attested by the
Office of Judicial Records
25 MAR 2019 01:59 pm

S. RICE
Jack Duignan
Chief Deputy

David E. Olweiler
Real Estate Deputy

David B. Dowling
Solicitor

Dauphin County
101 Market Street
Harrisburg, Pennsylvania 17101-2079
ph: (717) 780-6590 fax: (717) 780-6557

Nicholas Chimienti Jr.
Sheriff

Commonwealth of Pennsylvania

: EDWARD WALLS AND TONYA CHAVIS-
WALLS

VS

County of Dauphin

: MEDTRONIC, INC.

Sheriff's Return

No. 2019-T-0632

OTHER COUNTY NO. 190201262

And now: MARCH 1, 2019 at 11:55:00 AM served the within REISSUED WRIT OF SUMMONS upon PHYSIO-CONTROL, INC. by personally handing to DAVE BULAKOWSKI (SERVICE ASSOCIATE) 1 true attested copy of the original REISSUED WRIT OF SUMMONS and making known to him/her the contents thereof at C/O CSC, 2595 INTERSTATE DRIVE, SUITE 103 HARRISBURG PA 17110

Sworn and subscribed to
before me this 6TH day of March, 2019

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Karen M. Hoffman, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires January 8, 2022
Commission number 1257392

So Answers,

Sheriff of Dauphin County, Pa.

By
Deputy Sheriff

Deputy: HOWARD J LYNDE
Sheriff's Costs: \$85.75 2/28/2019

Filed and Attested by the
Office of Judicial Records
25 MAR 2019 02:34 pm
C. JONES

The Swain Law Firm, P.C.
Andrew D. Swain, Esq. (ID: 042651994)
Christopher A. Bradley, Esq. (ID: 019701999)
2410 Bristol Road
Bensalem, PA 19020
(215)702-2708/Fax: (215) 750-0895
swain@swainlawfirm.com
bradley@swainlawfirm.com

Attorneys for Plaintiffs

<p>EDWARD WALLS and TONYA CHAVIS-WALLS</p> <p style="text-align: center;">Plaintiffs</p> <p style="text-align: center;">v.</p> <p>MEDTRONIC, INC., et al</p> <p style="text-align: center;">Defendants</p>	<p>COURT OF COMMON PLEAS Trial Division</p> <p>FEBRUARY TERM, 2019</p> <p>NO: 19-02-1262</p> <p>MAJOR JURY</p>
---	---

AFFIDAVIT OF SERVICE

I, Andrew D. Swain, Esquire, attorney for Plaintiffs, do hereby certify that on February 27, 2019, a true and correct time-stamped copy of the Reissued Praecipe for Writ of Summons and a Reissued Writ of Summons, filed with the Court of Common Pleas of Philadelphia County on February 15, 2019, was served upon Defendant, Medtronic PLC, by Certified Mail, at 7000 Central Ave., NE in Minneapolis, MN 55432. See Return Receipt Green Card of Medtronic PLC attached hereto as Exhibit "A."

THE SWAIN LAW FIRM, P.C.

By: s/Andrew D. Swain

Andrew D. Swain, Esq.,
Attorney for Plaintiff

EXHIBIT “A”

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MEDTRONIC PLC
7000 Central Ave., NE
Minneapolis, MN 55432



9590 9402 1442 5329 3320 82

Article Number (Transfer from service label)

7003 1010 0002 3535 1687

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERYA. Signature ☒ Agent☐ AddresseeB. Received by (Printed Name) 3-27-19

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

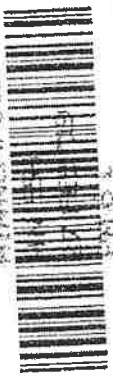
3. Service Type
- ☐ Adult Signature
 - ☐ Adult Signature Restricted Delivery
 - ☐ Certified Mail®
 - ☐ Certified Mail Restricted Delivery
 - ☐ Collect on Delivery
 - ☐ Collect on Delivery Restricted Delivery
 - ☐ Insured Mail
 - ☐ Insured Mail Restricted Delivery (over \$500)
 - ☐ Priority Mail Express®
 - ☐ Registered Mail™
 - ☐ Registered Mail Restricted Delivery
 - ☐ Return Receipt for Merchandise
 - ☐ Signature Confirmation™
 - ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



USPS TRACKING# 15



9590 9402 1442 5329 3320 82

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box.®

The Sugan Law Firm
2410 Bristol Road
Bensalem, PA 19020



The Swain Law Firm, P.C.
Andrew D. Swain, Esq. (ID: 042651994)
Christopher A. Bradley, Esq. (ID: 019701999)
2410 Bristol Road
Bensalem, PA 19020
(215)702-2708/Fax: (215) 750-0895
swain@swainlawfirm.com
bradley@swainlawfirm.com

*Filed and Attested by the
Office of Judicial Records
25 MAR 2019 02:35 pm
C. JONES*

Attorneys for Plaintiffs	
EDWARD WALLS and TONYA CHAVIS-WALLS	COURT OF COMMON PLEAS Trial Division
Plaintiffs	FEBRUARY TERM, 2019
v.	NO: 19-02-1262
MEDTRONIC, INC., et al	
Defendants	MAJOR JURY

AFFIDAVIT OF SERVICE

I, Andrew D. Swain, Esquire, attorney for Plaintiffs, do hereby certify that on February 27, 2019, a true and correct time-stamped copy of the Reissued Praecipe for Writ of Summons and a Reissued Writ of Summons, filed with the Court of Common Pleas of Philadelphia County on February 15, 2019, was served upon Defendant, Medtronic Puerto Rico Operations Co., by Certified Mail, at 7000 Central Ave., NE in Minneapolis, MN 55432. See Return Receipt Green Card of Medtronic Puerto Rico Operations Co. attached hereto as Exhibit "A."

THE SWAIN LAW FIRM, P.C.

By: *s/Andrew D. Swain*

Andrew D. Swain, Esq.,
Attorney for Plaintiff

EXHIBIT “A”

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>MEDTRONIC PUERTO RICO OPERATIONS CO. 7000 Central Ave., NE Minneapolis, MN 55432</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>Q. Miller</u> C. Date of Delivery <u>3-27-14</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>2. Article Number <i>Transfer from enclosure 1st-2nd</i></p> <p>7003 1010 0002 3535 1700</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053		Domestic Return Receipt	

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



USPS TRACKING # 175



9590 9402 1442 5329 3320 68

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box.

*The Swain Law Firm
2410 Bristol Road
Bensalem, PA 19020*



The Swain Law Firm, P.C.
 Andrew D. Swain, Esq. (ID: 042651994)
 Christopher A. Bradley, Esq. (ID: 019701999)
 2410 Bristol Road
 Bensalem, PA 19020
 (215)702-2708/Fax: (215) 750-0895
swain@swainlawfirm.com
bradley@swainlawfirm.com

Filed and Attested by the
 Office of Judicial Records
 25 MAR 2019 02:38 pm
 C. JONES

Attorneys for Plaintiffs	
EDWARD WALLS and TONYA CHAVIS-WALLS	COURT OF COMMON PLEAS Trial Division
Plaintiffs	FEBRUARY TERM, 2019
v.	NO: 19-02-1262
MEDTRONIC, INC., et al	MAJOR JURY
Defendants	

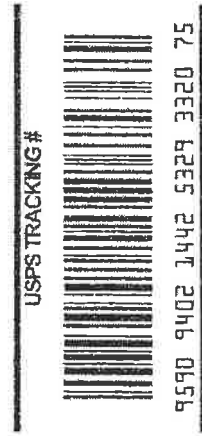
AFFIDAVIT OF SERVICE

I, Andrew D. Swain, Esquire, attorney for Plaintiffs, do hereby certify that on February 27, 2019, a true and correct time-stamped copy of the Reissued Praecipe for Writ of Summons and a Reissued Writ of Summons, filed with the Court of Common Pleas of Philadelphia County on February 15, 2019, was served upon Defendant, Medtronic Neuromodulation, by Certified Mail, at 7000 Central Ave., NE in Minneapolis, MN 55432. See Return Receipt Green Card of Medtronic Neuromodulation attached hereto as Exhibit "A."

THE SWAIN LAW FIRM, P.C.

By: s/Andrew D. Swain
 Andrew D. Swain, Esq.,
 Attorney for Plaintiff

EXHIBIT “A”



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box.

*The Swain Law Firm
2410 Bristol Road
Bensalem, PA 19020*

Wells

SENDER: COMPLETE THIS SECTION

1. ☐ Complete items 1, 2, and 3.
☐ Print your name and address on the reverse so that we can return the card to you.
☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MEDTRONIC
 NEUROMODULATION
 7000 Central Ave., NE
 Minneapolis, MN 55432



9590 9402 1442 5329 3320 75

2. Article Number (Transfer from service label)

7003 1010 0002 3535 1694

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

EDWARD WALLS and
TONYA CHAVIS-WALLS,

Plaintiffs,

v.

MEDTRONIC, INC.; MEDTRONIC USA,
INC.; PHYSIO-CONTROL, INC.; TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION; TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION; TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC.; TEMPLE UNIVERSITY
PHYSICIANS; TEMPLE PHYSICIANS, INC.;
TEMPLE UNIVERSITY HOSPITAL;
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC.; TEMPLE UNIVERSITY HOSPITAL,
INC.; PATRICK CONNOLLY, M.D.;
MEDTRONIC PLC; MEDTRONIC
NEUROMODULATION; and MEDTRONIC
PUERTO RICO,

Defendants.

COURT OF COMMON PLEAS
Office of Judicial Records
PHILADELPHIA, PA
29 APR 2019 10:55 am
G. IMPERATO

February Term, 2019

No. 01262

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter the appearance of Gregory T. Sturges on of behalf of Defendant Medtronic,
Inc. in the above-captioned action.

Dated: April 29, 2019

GREENBERG TRAURIG, LLP

s/ Gregory T. Sturges

Gregory T. Sturges (Pa. I.D. No. 200992)
1717 Arch Street, Suite 400
Philadelphia, PA 19103
Tel: 215.988.7820
Fax: 215.717.5238
sturgesg@gtlaw.com

CERTIFICATE OF SERVICE

I, Gregory T. Sturges, hereby certify that on this 29th day of April 2019, I served a true and correct copy of the foregoing Entry of Appearance on all counsel of record via the Court's electronic filing system.

s/ Gregory T. Sturges

Gregory T. Sturges

POST & SCHELL, P.C.
BY: AMALIA V. ROMANOWICZ,
ESQUIRE
E-MAIL: aromanowicz@postschell.com
I.D. # 65412
MICHAEL J. RYAN, ESQUIRE
E-MAIL: mryan@postschell.com
I.D. # 307654
FOUR PENN CENTER, 13TH FLOOR
1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PA 19103-2808
215-587-1000

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC., TEMPLE UNIVERSITY
PHYSICIANS, TEMPLE PHYSICIANS,
INC., TEMPLE UNIVERSITY HOSPITAL,
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC., TEMPLE UNIVERSITY HOSPITAL,
INC., PATRICK CONNOLLY, M.D.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

ATTORNEYS FOR DEFENDANTS,
TEMPLE UNIVERSITY HEALTH
SYSTEM FOUNDATION, TEMPLE
UNIVERSITY - OF THE
COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS, TEMPLE
PHYSICIANS, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM, INC.,
TEMPLE UNIVERSITY HOSPITAL, INC.
AND PATRICK CONNOLLY, M.D.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

2019 MAY 24 PM 3:17
OFFICE OF JUDGE J. R. ...

Walls Etal Vs Medtronic, Inc. Etal-STPLR



19020126200034

**STIPULATION FOR VOLUNTARY DISCONTINUANCE PURSUANT TO
PENNSYLVANIA RULE OF CIVIL PROCEDURE 229 AS TO LESS THAN ALL
DEFENDANTS AND TO AMEND THE CAPTION**

It is hereby STIPULATED and AGREED by and between the undersigned counsel for
the parties that:

(1) Any and all claims as to Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., are hereby **DISCONTINUED** pursuant to Pennsylvania Rule of Civil Procedure 229(b)(2) and **DISMISSED** with prejudice.

(2) Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., are hereby **DISMISSED** with prejudice.

(3) The caption shall be amended to REMOVE AND OMIT reference to Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., as follows:

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

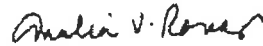
COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

POST & SCHELL, P.C.

BY:



DATED: May 13, 2019

AMALIA V. ROMANOWICZ, ESQUIRE
MICHAEL J. RYAN, ESQUIRE
Attorneys for Defendants, Temple
University Health System Foundation,
Temple University - Of the Commonwealth
System of Higher Education, Temple
University Physicians, Temple Physicians,
Inc., Temple University Health System,
Inc., Temple University Hospital, Inc. and
Patrick Connolly, M.D.

THE SWAIN LAW FIRM, P.C.

BY:



DATED: May 22, 2019

ANDREW D. SWAIN, ESQUIRE
CHRISTOPHER A. BRADLEY, ESQUIRE
ATTORNEYS FOR PLAINTIFFS



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION – CIVIL**

Walls, et al

Vs

Medtronic, Inc, et al

February TERM 2019

No. 1262

DOCKETED

JUN 18 2019

**N. ERICKSON
DAY FORWARD**

RULE RETURNABLE

AND NOW, this 18th day of June, 2019, a rule is hereby issued to show cause why this matter should not be non-prossed for failure to file a complaint in a timely manner.

Rule returnable the 17th day of July, 2019 at 9:30 a.m. in Courtroom 602, City Hall, Philadelphia, Pennsylvania.


All counsel and unrepresented parties shall appear unless the case is settled or withdrawn, in which case counsel must notify the court immediately in writing.

Walls Etal Vs Medtronic, Inc. Etal-CLLRR



19020126200037

BY THE COURT:



Arnold L. New, J.
Team Leader

POST & SCHELL, P.C.
BY: AMALIA V. ROMANOWICZ,
ESQUIRE
E-MAIL: aromanowicz@postschell.com
I.D. # 65412
MICHAEL J. RYAN, ESQUIRE
E-MAIL: mryan@postschell.com
I.D. # 307654
FOUR PENN CENTER, 13TH FLOOR
1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PA 19103-2808
215-587-1000

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM
FOUNDATION, TEMPLE UNIVERSITY OF
THE COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS AND
SURGEONS, INC., TEMPLE UNIVERSITY
PHYSICIANS, TEMPLE PHYSICIANS,
INC., TEMPLE UNIVERSITY HOSPITAL,
TEMPLE UNIVERSITY HEALTH SYSTEM,
INC., TEMPLE UNIVERSITY HOSPITAL,
INC., PATRICK CONNOLLY, M.D.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

ATTORNEYS FOR DEFENDANTS,
TEMPLE UNIVERSITY HEALTH
SYSTEM FOUNDATION, TEMPLE
UNIVERSITY - OF THE
COMMONWEALTH SYSTEM OF
HIGHER EDUCATION, TEMPLE
UNIVERSITY PHYSICIANS, TEMPLE
PHYSICIANS, INC., TEMPLE
UNIVERSITY HEALTH SYSTEM, INC.,
TEMPLE UNIVERSITY HOSPITAL, INC.
AND PATRICK CONNOLLY, M.D.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

DOCKETED

JUN 19 2019

N. ERICKSON
DAY FORWARD

Walls Etal Vs Medtronic-STPAP



19020126200038

Control No.
18068013

**STIPULATION FOR VOLUNTARY DISCONTINUANCE PURSUANT TO
PENNSYLVANIA RULE OF CIVIL PROCEDURE 229 AS TO LESS THAN ALL
DEFENDANTS AND TO AMEND THE CAPTION**

It is hereby STIPULATED and AGREED by and between the undersigned counsel for
the parties that:

(1) Any and all claims as to Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., are hereby **DISCONTINUED** pursuant to Pennsylvania Rule of Civil Procedure 229(b)(2) and **DISMISSED** with prejudice.

(2) Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., are hereby **DISMISSED** with prejudice.

(3) The caption shall be amended to REMOVE AND OMIT reference to Defendants, Temple University Health System Foundation, Temple University - Of the Commonwealth System of Higher Education, Temple University Physicians, Temple Physicians, Inc., Temple University Health System, Inc., Temple University Hospital, Inc. and Patrick Connolly, M.D., as follows:

EDWARD WALLS and TONYA CHAVIS-
WALLS,

Plaintiffs,

vs.

MEDTRONIC, INC., MEDTRONIC USA,
INC., PHYSIO-CONTROL, INC.,
MEDTRONIC PLC, MEDTRONIC
NEUROMODULATION, and MEDTRONIC
PUERTO RICO OPERATIONS CO.,

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2019

No. 1262

POST & SCHELL, P.C.

BY:

Amalia V. Roman

DATED: May 13, 2019

AMALIA V. ROMANOWICZ, ESQUIRE
MICHAEL J. RYAN, ESQUIRE
Attorneys for Defendants, Temple
University Health System Foundation,
Temple University - Of the Commonwealth
System of Higher Education, Temple
University Physicians, Temple Physicians,
Inc., Temple University Health System,
Inc., Temple University Hospital, Inc. and
Patrick Connolly, M.D.

THE SWAIN LAW FIRM, P.C.

A

BY:

DATED: May 22, 2019

ANDREW D. SWAIN, ESQUIRE
CHRISTOPHER A. BRADLEY, ESQUIRE
ATTORNEYS FOR PLAINTIFFS

*approved
By the Court
A. Henry
6-18-19*

THE SWAIN LAW FIRM
Andrew D. Swain, Esq. (Attorney ID: 73332)
Christopher A. Bradley, Esq. (Attorney ID: 84818)
2410 Bristol Road
Bensalem, PA 19020
swain@swainlawfirm.com
bradley@swainlawfirm.com
215-702-2708
Fax 215-750-0895

Filed and Attested by the
Office of Judicial Records
12 JUL 2019 04:11 pm
M. RUSSO

	Attorneys for Plaintiff
<p>EDWARD WALLS and TONYA CHAVIS-WALLS 6440 Haverford Rd. Philadelphia, PA 19151</p> <p style="text-align: right;">Plaintiffs</p> <p style="text-align: center;">v.</p> <p>MEDTRONIC, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110 and MEDTRONIC USA, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110 and PHYSIO-CONTROL, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110</p> <p style="text-align: right;">Defendants</p>	<p>COURT OF COMMON PLEAS Trial Division</p> <p>FEBRUARY TERM, 2019</p> <p>NO: 01262</p> <p>MAJOR JURY</p>

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief required by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Philadelphia County
Lawyer Reference Service
Philadelphia, PA
215-238-6333

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Attorneys for Plaintiff

<p>EDWARD WALLS and TONYA CHAVIS-WALLS 6440 Haverford Rd. Philadelphia, PA 19151</p> <p style="text-align: right;">Plaintiffs</p> <p style="text-align: center;">v.</p> <p>MEDTRONIC, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110 and MEDTRONIC USA, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110 and PHYSIO-CONTROL, INC. c/o Corporation Service Company 2595 Interstate Dr., Suite 103 Harrisburg, PA 17110</p> <p style="text-align: right;">Defendants</p>	<p>COURT OF COMMON PLEAS Trial Division</p> <p>FEBRUARY TERM, 2019</p> <p>NO: 01262</p> <p>MAJOR JURY</p>
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CIVIL ACTION COMPLAINT

1. Plaintiffs Edward and Tonya Chavis-Walls, husband and wife, are adult individual sand citizen of the Commonwealth of Pennsylvania residing at the address listed above.
2. Defendant Medtronic, Inc. is, upon information and belief, a corporation or other entity organized and existing under the laws of the State of Minnesota with its principal place of

business located at 710 Medtronic Pkwy, Minneapolis, MN, 55432, and registered agent at Corporation Service Company, 2595 Interstate Dr., Suite 103, Harrisburg, PA, 17110.

3. Defendant Medtronic USA, Inc. is, upon information and belief, a corporation or other entity organized and existing under the laws of the State of Minnesota with its principal place of business located at 710 Medtronic Pkwy, Minneapolis, MN, 55432, and registered agent at Corporation Service Company, 2595 Interstate Dr., Suite 103, Harrisburg, PA, 17110.

4. Defendant Physio-Control, Inc. is, upon information and belief, a corporation or other entity organized and existing under the laws of the State of Minnesota with its principal place of business located at 710 Medtronic Pkwy, Minneapolis, MN, 55432, and registered agent at Corporation Service Company, 2595 Interstate Dr., Suite 103, Harrisburg, PA, 17110.

5. At all times material hereto, Defendants acted and/or failed to act by and through their duly authorized agents, servants, owners, employees, managers, officers and/or workman.

6. At all times material hereto, Defendants regularly conducted business in the City of Philadelphia.

7. At all times material hereto, Defendants designed, tested, manufactured, packaged, labeled, marketed and sold the Medtronic brand deep brain stimulator, model 37603, Serial # NLB708314H (hereinafter "the 2013 deep brain stimulator" or "2013 DBS"), and DBS Lead model 3387S-40 Serial #VAD775J (hereinafter "the DBS Lead").

8. At all times material hereto, Defendants designed, tested, manufactured, packaged, labeled, marketed and sold the Medtronic brand deep brain stimulator, model 37612, Serial # NKG710853H (hereinafter "the 2014 deep brain stimulator" or "2014 DBS").

9. The 2013 DBS, 2014 DBS and DBS Lead were products placed in the stream of commerce by Defendants.

10. At all times material hereto, Defendants knew or should have known that the 2013 DBS, 2014 DBS and DBS Lead were defective in design, manufacture and warnings.

11. On March 19, 2013, Plaintiff underwent surgical implantation of the 2013 DBS and DBS Lead at Temple University Hospital, in order to address his gait/movement disorder.

12. It is believed and therefore averred that the 2013 DBS and DBS Lead were in the same condition when it left the possession of Defendants as it was when the original owner used the product.

13. Initially, Plaintiff saw improvement in his gait function and reduction of his tremors following this procedure.

14. The benefits of the 2013 DBS and DBS Lead gradually reduced over the course of the next eighteen months.

15. In or around November, 2014, Plaintiff was advised by his new physicians at the Hospital of the University of Pennsylvania that the IPG (implanted pulse generator), the battery-powered neurocharger that sends pulses to area of the brain targeted to disrupt neural activity and theoretically decrease Mr. Walls' action tremors, was no longer working and needed to be replaced.

16. The battery was replaced by Dr Baltuch on November 19, 2014.

17. Following replacement of the battery Mr. Walls enjoyed minimal benefit of the device.

18. In February 2017 Mr. Walls suspected the device was no longer functioning or was not functioning properly.

19. On February 15, 2017, Mr. Walls was advised the device no longer worked and needed to be replaced entirely.

20. Plaintiff was and remains unwilling to undergo a full revision, due to the existing and future additional damage and scar tissue such a procedure would cause.

21. As a direct and proximate result of the defective products described above, plaintiff sustained serious and permanent bodily injuries, developed mental distress, required medical care, and sustained permanent injuries and economic losses.

22. The bodily injuries proximately resulting from the incident include, but are not limited to, all side effects, scars and scar tissue from the two surgeries, severe tremors, gait dysfunction, pain from nerve damage, embarrassment, humiliation, and deformity, some or all of which will be permanent in nature to her great detriment and lost.

23. Plaintiff has in the past and may into the indefinite future, endure pain, suffering, loss of life's pleasures, inconvenience, mental anguish, emotional distress, disfigurement, embarrassment and humiliation, all to his great detriment and loss, financial and otherwise.

24. Plaintiff, in suffering these injuries has incurred past medical expenses, and may incur additional medical expenses into the future.

25. Defendants knew or should have known that the DBS, Leads and IPG had safety design defects.

26. Defendants knew or should have known that the DBS, Leads and IPG was unreasonably dangerous.

27. Defendants now know that the DBS, Leads and IPG is unreasonably dangerous and refuses to make design changes, which could spare consumers from future harm.

28. With bad motive, willful disregard and/or reckless indifference to the safety of consumers including, but not limited to, Plaintiff, Defendants did not warn its consumers or the public of the hazardous condition(s) posed by the DBS, Leads and IPG.

29. With bad motive, willful disregard and/or reckless indifference to the safety of consumers including, but not limited to, Plaintiff, Defendants did not perform necessary investigations of its own records and customer feedback to determine whether other consumers had suffered injuries due to malfunction of the DBS, Leads and IPG, which was also in violation of Defendants' own internal guidelines, policies and procedures.

30. The DBS, Leads and IPG were defective and unreasonably dangerous in that they were not adequately designed, tested, manufactured, packaged, labeled or marketed to minimize the risk of injury or to provide safe and effective use for consumers. The DBS, Leads and IPG were defective and unreasonably dangerous in one or more of the following ways:

- a. The DBS, Leads and IPG failed to perform the intended function of sending regular pulses to Plaintiff's brain;
- b. The DBS, Leads and IPG failed to supply power to the device allowing it to function; and
- c. Defendants failed to adequately research and design a more reliable source for power for its devices.

31. As a direct and proximate result of the defective and unreasonably dangerous conditions of the DBS, Leads and IPG, Plaintiff suffered severe injuries as referenced above.

32. At all times material hereto, the injuries suffered by Plaintiff were entirely foreseeable and, in fact, inevitable given the nature of the product.

33. Safer, alternative designs existed at the time of the design, manufacture and sale of the DBS, Leads and IPG. Those alternative designs were both economically and technically feasible at all times material hereto by the application of existing scientific knowledge.

34. In addition to the defects outlined above, Defendants also failed to provide adequate warnings and information regarding the unreasonably dangerous design of the DBS, Leads and IPG on the product.

35. At all times material hereto, Defendants knew and/or should have known that their product was defective in design, manufacture and/or warnings.

36. At all times material hereto, plaintiff neither knew nor had reason to know of the defective nature of the string trimmer.

37. As a direct and proximate result of the inadequate, negligent and/or defective designing, testing, manufacturing, labeling, packaging, marketing, selling, advertising, warning and otherwise distributing and placing the DBS, Leads and IPG in the stream of commerce, Plaintiff suffered severe and permanent injuries.

COUNT I
STRICT LIABILITY

38. Paragraphs 1 through 37 are incorporated by reference as fully set forth herein.

49. At all times material hereto, Defendants were engaged in the business of labeling, packaging, marketing, selling, advertising, warning and otherwise distributing and placing it in the stream of commerce the DBS, Leads and IPG at issue.

40. At all times material hereto, Defendants were also in the business of researching, developing, testing, producing, assembling, and manufacturing the DBS, Leads and IPG at issue.

41. The DBS, Leads and IPG trimmer at issue reached Plaintiff, the ultimate user and consumer of the product, without any substantial change in its condition from the time it was sold and/or manufactured by Defendants.

42. At the time it reached Plaintiff, the DBS, Leads and IPG was in a condition that was unreasonably dangerous to the ultimate user or consumer, taking into consideration the use for which it was intended and the risk involved in its use.

43. The DBS, Leads and IPG was defective and unsafe for its intended use at the time of its design, testing, manufacture, marketing and sale by Defendants. The product was defectively

designed, defectively tested, defectively manufactured, defectively labeled, defectively marketed and unreasonably dangerous to plaintiff and that the design, testing, manufacture, labeling and marketing of the DBS, Leads and IPG made it unsafe and dangerous for the reasons set forth above.

44. At the time the DBS, Leads and IPG left the possession of Defendants, there were safer alternative designs than that used in the subject DBS, Leads and IPG, any one of which would have significantly improved the safety of the DBS, Leads and IPG. Those alternative designs were both economically and technologically feasible.

45. The subject DBS, Leads and IPG left the control of Defendants while lacking the elements necessary to make it safe for its intended use.

46. The danger presented by the subject DBS, Leads and IPG is and was unknowable and unacceptable to the average or ordinary consumer.

47. A reasonable person would conclude that the probability and seriousness of harm caused by the lack of safety features outweighs the burden of or costs of taking precautions, which would include fixing/replacing the DBS, Leads and IPG.

WHEREFORE, plaintiff demands judgment in her favor and against defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars together with interest, costs, delay damages, punitive damages, and any other element of damages to which Plaintiff is entitled.

COUNT II **NEGLIGENCE**

48. Paragraphs 1 through 47 are incorporated by reference as if fully set forth herein.

49. Defendants failed to exercise reasonable care in designing, testing, developing, manufacturing, labeling, packaging, supplying, marketing, selling, advertising, warning and

otherwise distributing and placing in the stream of commerce the DBS, Leads and IPG at issue in the lawsuit as described above.

50. The negligence, carelessness, and/or recklessness of defendants also includes the following:

- a. Negligently designing the DBS, Leads and IPG at issue;
- b. Negligently manufacturing the DBS, Leads and IPG at issue;
- c. Failing to place appropriate warnings on the DBS, Leads and IPG at issue;
- d. Failing to properly design consumer safety features;
- e. Failing to perform appropriate testing that would have revealed the inadequate, hazardous and unreasonably dangerous issue;
- f. Failing to investigate test failure showing that the DBS, Leads and IPG was flawed;
- g. Failing to perform appropriate research and investigations into whether there had been prior bodily injuries;
- h. Failing to follow its own internal guidelines, policies and procedures as to investigation of reported injuries;
- i. Failing to obtain the information needed to determine whether the product was unreasonable dangerous, defective and/or hazardous to the consumer; and
- j. Failing to retain, employ and train its employees as to proper procedures and protocols regarding identification of defective/hazardous products and investigation into the existence of product defects and hazards.

51. As a direct and proximate result of the negligence, carelessness and/or recklessness of Defendants, Plaintiff suffered injuries described above.

52. As a direct and proximate result of the negligence, carelessness and/or recklessness of Defendants, Plaintiff has in the past and will in the future have to undergo extensive medical

care, and has in the past and will in the future expend sums for medical care, to his great detriment and loss.

53. As a direct and proximate result of the negligence, carelessness and/or recklessness of Defendants, Plaintiff has and will suffer a loss of life pleasures and the ability to enjoy life, and will be unable to engage and usual and customary daily activities some or all of which will be permanent in nature to her great detriment and loss.

WHEREFORE, plaintiff demands judgment in her favor and against defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars together with interest, costs, delay damages and any other element of damages to which Plaintiff is entitled.

Respectfully submitted,

THE SWAIN LAW FIRM, P.C.


BY: /s/ Christopher A. Bradley
CHRISTOPHER A. BRADLEY, ESQUIRE
Attorney for Plaintiff

DATE: July 12, 2019

VERIFICATION

I, Edward Wells, Plaintiff herein, make this Verification and states that the statements made in the foregoing document are true and correct to the best of his/her knowledge, information, and belief.

The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.



Edward Wells

Dated: _____

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

<u>WALLS</u>	:	FEBRUARY TERM, 2019
	:	
v.	:	NO. 1262
	:	
<u>MEDTRONIC, INC., et al.</u>	:	

ORDER

AND NOW, this 18th day of July, 2019, it is hereby ORDERED and DECREED the Rule Returnable listed for 17th of July, 2019, is DISSOLVED.

BY THE COURT


ARNOLD L. NEW, J.

Walls Etal Vs Medtronic, Inc. Etal-ORDER



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DOCKETED

JUL 18 2019

N. ERICKSON
DAY FORWARD



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA
COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION – CIVIL

WALLS ETAL

VS

MEDTRONIC, INC. ETAL

February Term 2019

No. 01262

**CASE MANAGEMENT ORDER
COMPLEX TRACK**

DOCKETED
TRIAL DIVISION - CIVIL
29-JUL-2019

B. LAWLOR

AND NOW, 29-JUL-2019, it is Ordered that:

1. The case management and time standards adopted for complex track cases shall be applicable to this case and are hereby incorporated into this Order.
2. All *discovery* on the above matter shall be completed not later than **05-OCT-2020**.
3. *Plaintiff* shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial to all other parties not later than **02-NOV-2020**.
4. *Defendant and any additional defendants* shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial not later than **07-DEC-2020**.
5. All *pre-trial motions* shall be filed not later than **07-DEC-2020**.
6. A *settlement conference* may be scheduled at any time after **04-JAN-2021**. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a). A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant;
 - (b). A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount;
 - (c). Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
7. A *pre-trial conference* will be scheduled any time after **01-MAR-2021**. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following:

- (a). A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
 - (b). A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c). A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d). Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
 - (e). Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;
 - (f). Each counsel shall provide an estimate of the anticipated length of trial.
8. *It is expected that the case will be ready for trial 05-APR-2021*, and counsel should anticipate trial to begin expeditiously thereafter.
9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this Order.

BY THE COURT:

**ARNOLD NEW, J.
TEAM LEADER**